



Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor
Mark J. Belton, Secretary
Mark L. Hoffman, Acting Deputy Secretary

March 10, 2016

Mr. Peter Conrad
Land Use Planning and Analysis
Maryland Department of Planning
301 West Preston Street, Suite 1101
Baltimore, MD 21201-2305

Dear Mr. Conrad:

On behalf of the Department of Natural Resources, thank you for offering an opportunity to comment on the 2016 *HarfordNEXT, a Master Plan for the Next Generation*. As development pressure increases and irreplaceable resource lands are lost, it is vital that Maryland grows smarter and more sustainably through a collaborative and informed public planning process. To that end, we offer below a series of comments to strengthen the draft Plan for your consideration:

Overall, the plan is very strong includes a lot of positive recommendations to conserve and protect natural resources in Harford County. The plan is well thought out and outlines specific goals and strategies to promote environmental stewardship and ensure a balance between economic, social and environmental resources. The plan includes specific goals for the preservation of large landscape scale natural resources, increased tree canopy strategies, floodplain protection and more. Below is some information from the Department of Natural Resources regarding specific resources in Harford County, along with recommendations to strengthen the plan.

Chapter 4: Environmental Stewardship

Page 5 under Adequate Stormwater Management: "Incentives to reduce the impacts of impervious surfaces could be identified in code updates." DNR recommends changing "could" to "will"

Page 6: The plan does not mention the Environmental Literacy Requirement that is now a state requirement for high school graduation. This requirement and program is a good opportunity to bring students and educators together with public lands and parks and to create outdoor experiences for students in their own communities.

Goal ES1.1 a DNR commends the County for this goal and rationale. While the use of ESDs can help to reduce impact, it is a new technology and studies need to be completed to determine the effectiveness to maintain biological habitat integrity. There is no substitute for restoration and leaving buffers in their natural state.

Goals ES 1.2 DNR Commends the County on discouraging development within the 100 year floodplain. The county should consider adopting a freeboard policy to minimize any infrastructure damage in areas vulnerable to coastal hazards. (We aware that the County is proposing a new freeboard standard as part of their new floodplain ordinance in 2016).

Goal ES 1.2 Consider land use change impacts when delineating and planning management of floodplains. Land Use changes upstream can exacerbate flooding downstream.

Goal ES 1.3: DNR is supportive of the landscape perspective on conservation and Harford County approach to facilitate movement corridors and habitat connections.

The plan calls for identifying "ecologically high-value land" based upon the presence of RT&E species. The idea being to then focus preservation efforts at those places to ensure the "health and biodiversity" found there is maintained. We certainly agree with that and strongly support it overall. Our concern however is that later in that same implementation section it is stated that Targeted Ecological Areas (TEA's) be prioritized in order to do so. While we recognize the value of TEA's in the larger State landscape context they cover only a subset of our data and do not provide the best representation of the distribution of RT&E species for a given county. The GIS data product best suited to do that would be our BioNet system. That is the most geographically precise data layer we have to depict the locations of our listed species. It is also prioritized already into ranked tiers to help provide further guidance. DNR recommends the use of this data for planning and implementation purposes under this goal. We would be very happy to work directly with them to make that happen.

Goal ES 1.4: DNR commends the county on the strong forest canopy goals and implementation measures.

Goal ES 2.3.b. It is not clear if this is referring to an existing or planned Watershed Action Plan. If it is existing, include a link or reference to when the Plan was developed.

Goal ES 2.3.c. Would the referred BMPs be located on public or private property? How would this be funded?

Goal ES 3.1 DNR commends the County for including goals of reducing impervious surfaces and specifically evaluating parking standards, including stricter limits within the Green Infrastructure Plan, and increasing height limitations to allow for flexibility in design and construction.

Goal ES 3.2 Tree Canopy program. The County establishes clear goals, identifies partners and strategies to increase tree planting activity. The plan calls for a detailed tree canopy study every ten years. It is not clear if the County has an existing study or when the last one was conducted.

DNR has done a demonstration project with Prince George's County, that included an analysis of where children and senior citizens, dense population and lower income communities live within the proximity to tree cover (Who is living in the Shade?). We can provide more information on this study if the County is interested in this type of analysis.

Goal ES. 4.1 Outreach and Education: There is a good opportunity to include goals here to increase the connection between children and nature. There are a lot of efforts both nationally and locally, including The Maryland Partnership for Children in Nature, that are actively working to connect children and families to outdoor spaces and build future stewards of the environment. DNR is working with the partnership to connect Marylanders to natural areas, provide nature connections to underserved communities and for local parks to help schools meet the Environmental Literacy requirements for the State of Maryland.

Goal ES 5.2.f The reforestation of urban environments can also help to reduce temperatures, heating and a/c cost and have other economic benefits.

Goal ES 5.5. b Coastal Resiliency: DNR commends the County on incorporating these strategies into its long term planning efforts. Analysis should also include green infrastructure at large and small scale that can provide natural buffer protection and increase community resiliency. DNR looks forward to working with the County on such efforts.

Fisheries Resources:

- There are many strong elements promoting conservation of high value natural resource features, most notably, repeated recognition of maintaining the rural character of Harford County's landscape. The MD DNR Fisheries Service reinforces this recommendation, because rural lands are associated with productive fisheries. Fisheries has adopted thresholds of impervious cover that are related to changes in habitat and fisheries, and these thresholds influence our ability to manage sustainable fisheries. Therefore, we support any recommendations and incentives to minimize the impervious footprint in a watershed.

Harford County has many important fisheries resources that support recreational and commercial anglers. They also are important to sustain biological integrity. These resources include:

Conowingo Reservoir which is a popular boating and fishing area with a good panfish, Largemouth Bass, and Smallmouth Bass fishery.

Susquehanna River provides anglers access to important recreational and commercial fisheries such as American Shad, Hickory Shad, Striped Bass, Smallmouth Bass, Largemouth Bass, Catfish, Yellow Perch, White Perch, and panfish. These quality fisheries attract anglers to Harford County.

Tidal rivers including the Susquehanna, Swan Creek, Bush River, and Gunpowder support a key tidal Largemouth Bass fishery that is nationally recognized as a high quality bass fishing area supporting tournament activities. Striped Bass, Yellow Perch, White Perch, catfish, and Blue Crab are harvested by recreational and commercial anglers in these waters.

Portions of the Little Gunpowder are stocked each spring with trout by Maryland Fisheries Service providing a very popular recreational resource for Harford Co. residents and area anglers. Several tributaries to Little Gunpowder contain populations of native Brook Trout. Brook Trout are a sensitive species that require cold, clean water and minimal development in a watershed. Brook Trout are also a focus in regional management efforts because habitat changes have impacted their occurrence. Maryland is participating in this effort to conserve existing habitat and recover historical habitat to recover Brook Trout habitat in the state. Maintaining the rural character of the watersheds and enhancing their habitat through targeted restoration supports this effort.

Deer Creek is an easily accessible stream and very popular with resident and non-resident anglers. It supports wild Brook Trout in its headwater tributaries, stocked Rainbow Trout in the Rocks State Park area, Smallmouth Bass and sunfish in the Palmer State Park area, and Hickory Shad, River Herring and the federally endangered Maryland Darter in the lower reaches.

Multiple tributaries of Deer Creek upstream of Cherry Hill Road contain populations of native Brook Trout. These watersheds should be afforded extra protection to limit development and impervious surface in order to maintain habitat conditions and support a sustainable population.

Though not as prevalent as agriculture and historical landmarks, fishing is also part of the County's heritage. According to individual license sales, 12.2% of county residents purchased a recreational fishing license in 2015. This estimate is 3.6% over the statewide average of 8.6%. Residents and visitors to Harford county can take advantage of various fishing opportunities as previously described.

In addition to providing recreational opportunities, fishing also provides economic opportunities for county residents. In 2015, 309 residents purchased a commercial

fishing license, permitting them to harvest fish and crabs for market. In order to maintain this livelihood the county must promote sound land planning and conservation to assure fish habitat remains productive.

Other specific recommendations related to maintaining the rural character of the watershed:

- DNR supports the goal of mixed use development with town centers and walkable neighborhoods with large tree lawns for tree planting, and moving foot traffic to a center point. Also connecting communities in the planning stage and existing communities if possible, to existing trails and open space as well as creating new trails to planned and existing developments.
- DNR recommends creating a list of banned landscape invasive tree, shrub and flower lists. Some examples are callery pear, Norway maple, burning bush, Japanese barberry. In addition, increasing awareness of the State Roadside Tree Law will prevent unpermitted, unplanted areas with potentially unsuitable trees in Community Planning Areas.
- All pedestrian and bicycle friendly roads should be marked as such with lanes. Larger tree lawns (buffer between sidewalk and road) to allow large size shade trees, benches and side connects to other communities and shops.
- Shade trees, infiltration road surfaces, rain gardens, and infiltration stormwater wetlands are important in any kind of development, but especially near business, industry and medium to high density development.
- DNR recommends starting a "Lawn to Woodland" type program in Harford County to increase tree canopy and all of its benefits.
- DNR recommends collaborating with Baltimore County and York County, PA to buffer lands upstream of recreational areas, such as, Kilgore Falls.
- Upgrades/retrofits need to be made to the many outdated stormwater management ponds that concentrate high volume and velocity of runoff into many streams, small and large, scouring and undercutting stream banks.
- Retain or establish forest buffers around new drinking water reservoirs, such as the proposed reservoir at Winters Run to purify water and reduce purification costs. Buffer unbuffered areas of other drinking water sources. The County can join the State's Backyard Buffer Program and find grants to provide whole package of trees, shelters, and mats.
- Initiate a Harford County Lawn to Woodland Program to increase canopy and provide many other benefits.
- Work with MD DNR Forest Service to Place County forests in Forest Stewardship Plans according to the County's objectives for that property. Set up demonstration areas for the public and students to see how to manage their woodlots for multiple resources.
- Initiate a tree planting program especially for medium to high density development areas to give away trees to plant in their yards and teach landowners how to maintain them.

- Plant trees in Road right of ways in front of houses that want trees, especially on larger tree lawns, free of charge. The Town of Bel Air has started this program through the blanket program. Have a list of trees that fit the spaces.
- Use GIS to ID Urban and Rural planting areas in Community Planning Areas.
- Work with MD DNR Fisheries and Forest Service, Trout Unlimited, et al. to restore Trout habitat in the upper reaches of Deer Creek.

Chapter 6: Mobility and Connectivity:

Page 3: The Plan includes a good discussion of potential improvements and enhancements. This is also a good opportunity to connect people to the outdoors through trails and to create future environmental stewards.

Goal MC 2.1 Complete Streets. DNR commends the County for this goal and implementation actions.

Goal MC 2.3 Access to County Parks. DNR has completed a Park Equity Analysis that shows areas of low income and their relative proximity to public lands. This tool can be used to guide access to parks and recreation facilities where it is currently underserved.

Goal MC 5.3 The plan mentions Safe Routes to Schools as a strategy for connecting public lands to schools. There also is a program called Safe Routes to Parks (through the National Parks and Recreation Association) that could support this goal. (Chp 6 pg 102)

Chapter 7: Promoting Healthy Communities

Goal PHC 1.1. DNR greatly supports this goal and actions. A more explicit connection could be made to connecting children to natural areas and outdoor spaces.

Goal PHC 1.2 The plan references the recommendations of the 2012 LPPRP. It should also refer to the update of the document currently under way. (Chp 7 pg 110)

Goal PHC 1.2 DNR fully supports the walkability standard of a 1/4 mile for access to recreational facilities versus the 30 acres/1,000 metric (chp 7 pg 111).

Goal PHC 1.4.d. This could also include the level of standards for green spaces to create healthy walkable communities.

Goal PHC 2.3 Hazard Mitigation

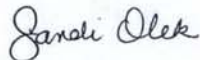
Goal PHC 4.2 This is another good place to include the goals of getting children and citizens outside. There are programs such as Docs in the Park, and other health related initiatives the explicitly make the connections between outdoor time and health.

Appendix II: Water Resources Element

DNR supports the implementation recommendations in the Water Resources Element. We strongly encourage the county to implement the Deer Creek WRAS to complete the restoration plan. Deer Creek is a unique resource to the County and the state. It has viable trout waters, along with healthy spawning habitat for River Herring. River Herring have been under strict federal management, because stocks are severely depleted. Maryland recently enforced a fishing moratorium to comply with federal requirements. Recent studies have linked declines in spawning habitat quality with increased watershed development. We promote conservation and restoration of the Deer Creek watershed, to continue to protect the viability of Herring Spawning Habitat in the watershed.

On behalf of the Department, I would like to congratulate you on a thorough and balanced plan. DNR looks forward to working with you on many of the implementation measures over the coming years. If you should have any questions about these comments or would like further information, please do not hesitate to contact me.

Sincerely,



Sandi Olek
Integrated Policy and Review
Maryland Department of Natural Resources



Maryland Department of Transportation
The Secretary's Office

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Pete K. Rahn
Secretary

MEMORANDUM

TO: UPPER SHORE REGIONAL PLANNER, MARYLAND DEPARTMENT OF PLANNING,
DAVID DAHLSTROM
FROM: DIRECTOR, OFFICE OF PLANNING AND CAPITAL PROGRAMMING, HEATHER MURPHY
SUBJECT: DRAFT 2016 HARFORDNEXT COMPREHENSIVE PLAN COMMENTS
DATE: MARCH 10, 2016
RESPONSE
REQUESTED BY: MARCH 6, 2016

PURPOSE OF MEMORANDUM

The Maryland Department of Transportation's (MDOT) submits the following comments for consideration to the Maryland Department of Planning for a unified State of Maryland response to the Draft 2016 HarfordNEXT, a Master Plan for the Next Generation.

GENERAL COMMENTS

The MDOT supports the 2016 HarfordNext, Harford County's comprehensive plan in general and specifically in the following areas of detail:

Office of Planning and Capital Planning:
Chapter 6, Mobility and Connectivity

- Page 94:
 - Recommend noting that right-of-way needed to provide sidewalks and bike facilities should be included in Goal MC 1.1: Preserve right-of-way to effectively meet long-range transportation goals.
 - Recommend including pedestrian and bicycle safety as part of Goal MC1.2: Improve road safety conditions.
- Page 94-95:
 - Consider including the flexibility to use travel time standards under Goal MC 1.3: Reduce congestion.
- Page 95:
 - We support the attention to freight needs under Goal MC 1.5 and encourage continued coordination with MDOT to address key freight corridor needs.

My telephone number is _____
Toll Free Number 1-888-713-1414 TTY Users Call Via MD Relay
7201 Corporate Center Drive, Hanover, Maryland 21076

- Page 98:
 - Rationale for Goal MC 3.3. Please note that bicyclists are not required to travel on shared use paths adjacent to roadways. Consider rephrasing the rationale to note that these facilities provide an option for bicyclists and pedestrians to travel separate from auto traffic.
 - Goal MC 3.3. Please consider including a strategy related to prioritizing the development of shared use paths within existing communities and to create regional connections to destinations.
- Page 99:
 - Goal MC 4.1: Please rephrase strategies a, b, and c to reflect that the County would need to work with MTA and/or encourage MTA to take these actions.

Chapter 8, Community Planning Area

- Page 159:
 - CPA 5.19: Improve Overall Transit Services, item (b) should be revised to refer to the Aberdeen TOD Master Plan (adopted March, 2012), instead of the Aberdeen Train Station TOD Study. This Master Plan, adopted by the Aberdeen City Council was developed in partnership with Harford County, including current Harford County Council President Slutzky, and staff from appropriate Harford County departments. Correctly noting it as the adopted Master Plan, rather than study denotes its adoption and endorsement and establishes a consistency reference and may help further its implementation by using supportive consistency references for future grant applications.
 - Additionally, CPH 5.19: Improve Overall Transit Services, item (b), states implement pertinent recommendations of the above referenced "study" Master Plan, but does not identify or provide any sense of what those items are. The Master Plan which was presented to and supported by the Harford County Council in advance of its final adoption by Aberdeen, includes implementation actions that have been identified for the State, Aberdeen and Harford County. The County could utilize that listing to update this policy with remaining activities it will work with Master plan partners on regarding implementation.
 - CPA 5. 19 (e) "Provide additional MARC and MTA Commuter Bus Service to Aberdeen, a reverse commute service from Baltimore with a direct connection to APG, and work with MTA to establish an I-95 Commuter Bus Route originating at the MD 155 Park and Ride Lot with stops at the I-95/MD 22 Park and Ride and the Riverside Park and Ride lot", does not provide any information about how the County intends to help facilitate and or coordinate this additional service, or how it will work with MTA to establish. The goal for these needs and services need to be supported by an updated policy that explains how the County will work to accomplish these.

- CPA 5.17: Integrate Transportation for Livable Community Initiatives, states “(a) Prioritize streetscape beautification projects and implement the pertinent recommendations of the MD 22 Corridor Study and the U.S. 40 Green Boulevard adjacent to the Aberdeen Train Station.” The reference to the U.S. 40 Green Boulevard appears to reference the proposed enhancements envisioned in the Aberdeen TOD Master Plan and should include that reference if that is accurate. Additionally, the County Priority letter doesn’t appear to include any indication of order or magnitude of preference for projects like these, as other priority letters seem to. As funding always tends to exceed the local government requested projects, the county may wish to establish a ranking in their annual priority letter for the projects like these that it supports and wants to be considered for funding. Policy 5.17 could also be updated to include supportive references to this, by rewording to note “Prioritize....in the top five streetscape beautification (complete streets) projects in the County annual priority letter submitted to MDOT.” (Providing the county council the ability to rank order those projects during their prioritization letter process).
- Page 160
 - CPA 5.20 Cost efficient ways to manage transportation congestion and expand transportation demand management, Item (c), states “Attract APG shuttle service to connect commuters from the Aberdeen Train Station to APG”, but does not indicate how the County will work towards accomplishing this. It should be revised to include the action steps the County will utilize to “attract....APG shuttle service to connect commuters from the Aberdeen Train Station to APG”. This is also identified as an important action implementation item in the Adopted Aberdeen TOD Master Plan, which may assist in appropriate updates for CPA 5.20

State Highway Administration RIPD – supports the 2016 HarfordNEXT, county comprehensive plan in general and specifically in the following areas of detail:

Chapter 1, Introduction

- Page 12 #6
 - One of the big ideas is “holistic transportation planning” that is defined to include innovative approaches, relieving congestion, improve safety, reducing travel demand in the peak hours, promote transportation alternatives (such as biking and walking), and establishing a Complete Streets program. [page 12, #6]
- Page 13 and Chapter 8
 - The plan specifically spells out the provision for multimodal connections in the Community Areas Section.

- Pages 15 through 17
 - In responding to the 12 State Planning Visions spelled out in the 2009 Smart, Green, and Growing legislation, HarfordNEXT promotes mixed-use and transit oriented development that provides multi-modal transportation options. It also seeks to establish an efficient and reliable multi-modal transportation system within Harford County that encourages walking and biking. In furthering the State Planning Visions, it states that Harford County uses many tools, including Adequate Public Facilities legislation, by tying development to the capacity of existing services such as roads.

Chapter 2, Grow with Purpose

- Pages 34 and 35
 - Goal 1.3 is to encourage integrated mixed-use pedestrian oriented design, allowing greater walkability. Part of the implementation is to consider flexible zoning alternatives, such as overlay districts and Planned Unit Development, that will help bring about successful mixed-use projects.
- Page 35
 - To implement Goal 2.1, require adequate public facilities and infrastructure for all development, it calls to develop and maintain level of service standards and create phasing requirements. These are both important access management techniques used by SHA.
- Page 37
 - To implement Goal 3.4, identify opportunity sites for reinvestment and revitalization, the plan calls for creating and investing in transit oriented development opportunities surrounding MARC station areas.

Chapter 6, Mobility and Connectivity

- Page 89
 - The plan recognized the nexus between transportation and land use and calls for the prioritization of providing transportation options over costly roadway expansion as part of the holistic approach to transportation and land-use planning. It further calls for strengthening the interconnectivity of our communities and recognizing that transit must be part of a comprehensive strategy to solve many of our transportation issues.
- Page 94
 - To implement Goal 1.2, improve road safety conditions, it says to ensure that roadway designs prioritize safety for all modes of transportation.

- Page 96
 - To integrate transportation with land-use planning in support of Goal 2.1, Establish a Transportation for Livable Communities program, the plan calls for promotion of walkable neighborhoods that facilitate connectivity.
- Pages 96 and 97
 - In support of Goal 2.2, reinforce the connection between transportation planning and land use planning through updates to manuals, regulations, and design standards, the plan calls for updating the Harford County Road Code to ensure specifications accommodate all travel modes, plan for connections between parcels, and create pedestrian-oriented public spaces which are easily accessible by walking, biking, or transit.
- Pages 97 and 98
 - In support of Goal 3.1, establish development standards that incorporate multimodal options and connectivity into new projects, the plan calls for connecting neighborhoods and local destinations with sidewalks and pathways. The goal is further implemented by incorporating shared access points for commercial developments.
- Page 98
 - In support of Goal 3.2, improve safety for bicyclist and pedestrians, the plan calls for providing pedestrian access and intersection improvements near transit stops and implementing "Road Diets."
- Page 101
 - Goal 4.6 calls for upgrading park-and-ride services and facilities throughout Harford County.

Maryland Transit Administration:

The MTA promotes a multimodal approach to transportation. Harford County's HarfordNEXT Master Plan embraces this concept not only with existing conditions but also in future planning. Engaging government, private enterprise, and its citizenry in the transportation process is vital to its success. Goals including but not limited to: establishing development standards that incorporate multimodal options and connectivity into new projects; expanding commuter train and bus service along the northeast corridor; and establishing safe, convenient, and accessible bus stops shows the County's large scale commitment to its overall present and future transportation program.

cc: Ms. Monica Phelan, Administrative Assistant, Maryland Department of Planning

DRAFT 2016 HarfordNEXT, a Master Plan for the Next Generation

Maryland Department of the Environment - Science Services Administration

I. Comments on the Water Resources Element:

Stormwater and Analysis of Nonpoint Sources

II. Comments on Additional Water Quality Requirements:

Consistency with Total Maximum Daily Loads

III. Additional Comments

IV. MDE Contact for Additional Information

REVIEW FINDING: **Harford County Master Plan (MD2016 0208-0085)**

R4 – Additional Information Requested

I. WATER RESOURCES ELEMENT

In order to prepare the Water Resources Element of the Comprehensive Plan, Harford County must provide a simple nonpoint source analysis to estimate changes in nutrient loads resulting from proposed land use changes. The County has provided a Plan that contains a Water Resources Section, but does not provide the Nonpoint Source (NPS) Loading Analysis either in the document or a reference that can be reviewed. **See Additional Comments for recommendations.**

The NPS analysis and discussion should provide the following information:

- 1) Describe alternative land use options.
- 2) Perform and document the NPS analysis (including nitrogen and phosphorus loads).
 - a) Describe methods and justify assumptions that differ from the NPS spreadsheet that is available upon request from MDE. (See below)
- 3) Compare results for alternative options.
 - a) NPS nutrient loads
 - b) Amount of impervious cover
 - c) Point and nonpoint nutrient load implications
- 4) Include recommendations in the Comprehensive Plan for refining the NPS analyses in the future.

Guidance and a more detailed description of the nonpoint source analysis was found in Water Resources Element Guidance – Models and Guidelines No. 26. The

Guidance document may be downloaded from the following website:

<http://planning.maryland.gov/pdf/ourproducts/publications/modelsguidelines/mg26.pdf>

(This might take a while to download because this file is over 15 MB in size.)

II. ADDITIONAL WATER QUALITY REQUIREMENTS

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

- A. Impaired waters in the local vicinity, which are identified on Maryland's 303(d) List;
- B. TMDLs in the local vicinity, which have been established for impaired waters;
- C. Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy; and
- D. General guidance.

A. Water Quality Impairments

Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list.

County planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:

<http://www.mde.state.md.us/programs/Water/TMDL/Integrated303dReports/Pages/303d.aspx>.

This list is updated every even calendar year. County planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs.

Note that upstream jurisdictions also share in the responsibility for addressing downstream impairments, which might not be identified in the summary above. In addition, jurisdictions that eventually drain to the Chesapeake Bay have a general responsibility to control nutrients as part of the Chesapeake Bay Agreement Tributary Strategies.

B. TMDLs

Development and implementation of the Comprehensive Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Government decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

<http://www.mde.state.md.us/programs/Water/TMDL/CurrentStatus/Pages/Programs/WaterPrograms/TMDL/Summittals/index.aspx>

C. Anti-degradation of Water Quality

The State of Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies."

The following segments have been designated as High Quality Waters Broad Creek 1, Bynum Run UT 1, Cattail Branch UT 1, Deer Creek 2, Deer Creek 3, Deer Creek 4, Deer Creek 5, Deer Creek 6, Deer Creek 7, Deer Creek 8, Deer Creek UT 1, Deer Creek UT 2, Deer Creek UT 3, Falling Branch 1, First Mine Branch 1, Hollands Branch 1, Little Deer Creek 1, Little Deer Creek 2, Little Deer Creek UT 1, Little Gunpowder Falls 1, Little Gunpowder Falls 2, Little Gunpowder Falls 3, Little Gunpowder Falls 4, Otter Point Creek 1, and Wet Stone Branch 1. (See attached map)

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at:

<http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04.htm>

and policy implementation procedures are located at

<http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website:

<http://www.mde.state.md.us/programs/Water/TMDL/Water%20Quality%20Standards/Pages/HighQualityWatersMap.aspx>

For the purposes of comprehensive planning, Harford County should consider both the Tier II segments that have been formally designated as well as those stream segments that are pending Tier II designation.

To request the Tier II GIS information, please contact Angel Valdez at angel.valdez@maryland.gov.

D. General Guidance

Land use planning should reflect the limits on pollutant loads necessary to meet water quality standards. Techniques now exist to support land development that minimizes the generation of the pollutants that are impairing our waters. It will be in the interest of local jurisdictions to adopt these techniques to optimize growth in a manner that is consistent with TMDLs and the Tributary Strategies for nutrient reduction developed under the 2000 Chesapeake Bay Agreement.

Examples of planning techniques that consider TMDLs:

- 1) Consider alternatives to surface water discharges, where applicable. For example, consider identifying land for future spray irrigation of treated municipal waste if the direct discharge of effluent to a stream could become limited by a TMDL or the Bay Agreement nutrient allocations.
- 2) Consider land use planning that will maximize the preservation of forested land, which contributes the least amount of nutrient loading per acre.
- 3) Consider giving priority to site designs that minimize impervious area and nutrient loads per unit of development.

For more general guidance:

Protecting Water Resources with Smart Growth

<http://www2.epa.gov/smart-growth/protecting-water-resources-smart-growth>

Best Development Primer

<http://www.epa.gov/smartgrowth/pdf/bestdevprimer.pdf>

Better Site Design: A Handbook for Changing Development Rules in Your Community

http://www.cwp.org/better_site_design.htm

III. ADDITIONAL COMMENTS

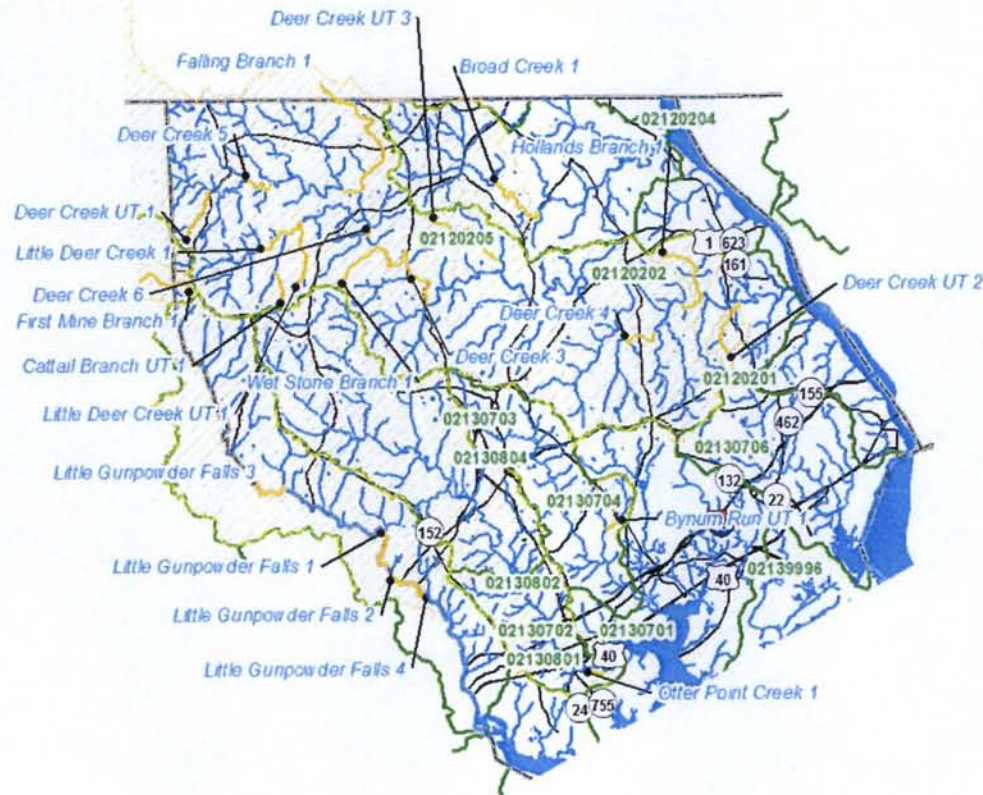
Nonpoint Source Analysis

The NPS Analysis should be included as there is not a clear indication that the Restoration Plans that are being developed for the TMDL SW-WLA incorporate growth as portrayed in the Grow with Purpose section. MAST was referenced as being used but MAST does not have the ability to incorporate future land conditions.

IV. MDE CONTACT FOR ADDITIONAL INFORMATION

For additional information concerning the nonpoint source analysis, water quality impairments, TMDLs, and anti-degradation requirements, please contact Jim George at 410-537-3902.

HarfordNEXT, a Master Plan for the Next Generation
Harford County
MD2016 0208-0085



Legend

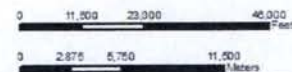
- Streams
- MD High Quality Waters
- MD High Quality Waters
- Proposed Expansion
- County Line
- 8-digit Watershed
- Major Roads

Map Date: 3/4/2016 Drawn By: MDE SSA



Data Sources:

Streams - State Highway Administration
Major Roads - State Highway Administration
Watersheds - 8-digit - MD Dept. of the Environment



Additional Comments Received from MDE:

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.

March 4, 2016

Mr. Bradley F. Killian, Director
Harford County Department of Planning and Zoning
220 South Main Street, 2nd Floor
Bel Air, MD 21014

Dear Mr. Killian:

Thank you for the opportunity to review *HarfordNEXT*, the Harford County draft master plan, and submit comments on behalf of the Maryland Historical Trust. Overall, we are pleased to see that Harford County recognizes the important role that historic preservation plays in maintaining and enhancing quality of life for County residents and visitors.

We note that the plan includes "promotion of our historical and cultural resources" as one of the six overarching "Big Ideas," informing the theme "Protecting Our Heritage" and the goal of protecting natural, historic and cultural resources for each of the seven community areas. The plan's section (Chapter 5) on historic and cultural preservation covers all of the major issues and we support the proposed implementation activities. We have noted specific comments by page number below.

- p. 29 The Maryland Historical Trust would be pleased to offer technical assistance to Harford County as it pursues an update of the 2007 Rural Villages Study. Please contact Heather Barrett, Administrator of Research and Survey, at heather.barrett@maryland.gov or (410)514-7642.
- p. 70 We appreciate that two the "Protecting Our Heritage" principles -- "Build Capacity For Preservation" and "Educate and Connect with a Broader Audience" -- echo, respectively, Goals 4 and 1 of *PreserveMaryland*, the statewide preservation plan. We note, however, that the goals and implementation steps for "Build Capacity for Preservation" (p. 83) align better with *PreserveMaryland*'s Goal 2: Improve the Framework for Preservation. (In the state plan, Goal 4: Build Capacity and Strengthen Networks is primarily focused on non-profit organizations and public-private partnerships.) We recommend that you 1) indicate the connections to the state plan in *HarfordNEXT* and 2) consider changing the title of the "Build Capacity" principle to align with the state plan Goal 2. We also encourage you to share any success stories in plan implementation through our Google forms online (<http://mht.maryland.gov/plan-goal2.shtml> and <http://mht.maryland.gov/plan-goal1.shtml>).
- p. 73 We recommend adding the Lower Susquehanna Heritage Greenway to the map of historic and cultural resources, along with a reference to the Maryland Heritage Areas Program as a potential funding source for historic and cultural properties within the heritage area boundary.

Here or elsewhere as appropriate, the plan should include the following language, to best meet the statutory requirement that local jurisdictions must include, by reference, the approved Heritage Area Management Plan in comprehensive or master plans (Financial Institutions Article, Title 13, Subtitle 11, Annotated Code of Maryland, § 13-1111 (e)):

The Management Plan of the Lower Susquehanna Heritage Greenway was adopted and made a part of the comprehensive plans of Harford and Cecil Counties in 2000. This update of the master plan, when adopted by the County, incorporates by reference all portions of the Lower Susquehanna Heritage Greenway Management Plan, except those portions solely relating to other jurisdictions within the Heritage Area, as part of the master plan.

- p. 80 "Goal POH 1.1: Identification and Evaluation of Historical and Cultural Resources" is aligned with PreserveMaryland's Goal 3: Expand and Update Documentation. We encourage you to reference this within the master plan and to share any implementation successes in the Google form for the statewide plan: <http://mht.maryland.gov/plan-goal3.shtml>.
- p. 84 We appreciate that "Goal POH 4.3: Collaborate to Advance Shared Objectives" is related to PreserveMaryland's Goal 5 and encourage you to record any implementation successes in the online Google form for the statewide plan: <http://mht.maryland.gov/plan-goal5.shtml>.

Thank you for the opportunity to comment on the Harford County draft master plan. If you have any questions, please contact me at nell.ziehl@maryland.gov or (410) 514-7625.

Sincerely,



Nell Ziehl
Chief, Office of Planning, Education and Outreach

cc: Heather Barrett, Maryland Historical Trust

March 22, 2016

Bradley F. Killian, Director
Harford County Planning & Zoning
220 S Main Street
Bel Air, MD 21014

Dear Mr. Killian:

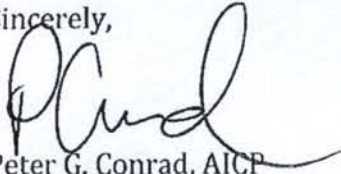
Thank you for the opportunity to comment on the draft 2016 HarfordNEXT, a Master Plan for the Next Generation. The Maryland Department of Planning (Planning) believes that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, community character, and economic development. Please consider that Planning's attached review comments reflect the agency's recommendations on ways to strengthen the County's Plan, as well as satisfy the requirements and intent of the State Land Use Article.

The Department forwarded a copy of the HarfordNEXT Master Plan to a number of State agencies for review including, the Maryland Historical Trust and the Departments of Agriculture, Commerce, Environment, Housing, Natural Resources, and Transportation. To date, we have received comments from the Maryland Historic Trust and the Departments of Environment, Natural Resources, and Transportation; these comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

HarfordNEXT provides a guide future decisions, investments and implementation strategies for the County. When adopted, HarfordNEXT will combine the various Harford County Comprehensive Plan elements into a single plan. The 2016 draft HarfordNEXT Master Plan incorporates the County's SB236 Growth Tier Map, as required by State law. Planning respectfully requests that this letter and accompanying review comments be made part of the County's public hearing record. Furthermore, Planning also asks that the County consider our comments as revisions are made to the draft Plan, and to any future plans, ordinances, and policy documents that are developed.

Please feel free to contact me at (410) 767-4500 or David Dahlstrom, AICP, Regional Planner, at (410) 819-4084.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Conrad', written over the printed name.

Peter G. Conrad, AICP
Manager, Local Assistance and Training

Enclosures: Comments on the draft HarfordNEXT Master Plan

cc:

David Dahlstrom, AICP, Regional Planner
Monica Phelan, MDP Clearinghouse
File

**Maryland Department of Planning
Review Comments
Draft HarfordNEXT
March 22, 2016**

General:

Planning commends Harford County for its development of *HarfordNEXT*. The County identified five primary objectives with this plan:

- Establish a vision for Harford County.
- Consolidate various element plans into one cohesive document.
- Create a document that is accessible and easily understood.
- Provide strategic implementations to guide County actions.
- Refine planning strategies to be implemented at the community level.

HarfordNEXT achieves the goal of establishing a vision for Harford County. As contained in these review comments, Planning encourages the County to consider providing some additional clarity to the future vision for Harford County in the *HarfordNEXT Master Plan*. This clarity can be provided by providing more details on issues, challenges, and priorities in either the introductions sections of each element, within the various implementation steps within each element, or perhaps as an Appendix.

HarfordNEXT achieves the goal of consolidating the various elements into one cohesive document. Specific review comments on each element are provided below for your consideration.

HarfordNEXT achieves the goal of being accessible and easily understood. The supporting data is graphically presented in a reader friendly manner and visually effective and captivating. While comprehensive plans can often be too complex, *HarfordNEXT* may be missing an opportunity to provide text, data, and measures to support the various implementation steps and goals that appear in the plan.

HarfordNEXT provides strategic implementations to guide County actions. The County may wish to identify which implementation steps are the priorities, or anticipated to be achieved within the first 1-5 years of adoption. This may assist the County as you create the implementation Strategic Plan identified in GWP:5.2(a); prepare the newly required 5-Year Mid-Cycle Report, pursuant to §1-207(c)(6)(ii), to include the status of comprehensive plan implementation tools such as comprehensive rezoning to carry out

the provisions of the comprehensive plan; and to identify transportation projects to be included in the County's Priority Letter.

HarfordNEXT provides strategies to be implemented at the community level. Specific review comments on the Community Planning Areas Element are provided.

Chapter 1: Introduction

- Page 8: The opening paragraph indicates that the County faces new challenges. Those challenges should be identified and the Plan should identify what strategies will be used to address those challenges.
- Page 8, Paragraph two: indicates that the Plan provides strategies to create opportunities for small businesses and incentives to attract large national corporations. Consider addressing this topic in the Big Ideas Section (Page 11), and highlighting these strategies as a unique goal in the Economic Vitality Chapter.
- Page 8, Paragraph two: consider revising the sentence “*HarfordNEXT* must balance the preservation of productive farm land with sustainable development, to ensure continued economic vitality”. Farm land preservation and economic vitality are not mutually exclusive and this sentence appears to leave infill development within the Development Envelope out of the equation.
- Page 9: Second to last paragraph, consider identifying the total number of acres (15,489) needed to meet the goal of preserving 80% of remaining undeveloped land.
- Page 10, Big Ideas: This is the only part of *HarfordNEXT* that addresses the topic of “Big Ideas”. There are six signature ideas presented but the remainder of the *HarfordNEXT* plan does not directly correlate the implementation steps with these six signature ideas. The County should consider indicating which implementation steps will be used to measure achievement of these signature ideas and the vision for Harford County.
- Page 12: In the last sentence of the *Holistic Transportation Planning* paragraph, there is a statement that “Preserving rights-of-ways is essential to meeting long-range transportation goals and establishing a Complete Streets Program”, but there are no corresponding implementation strategies contained in the Chapter 6, Mobility and Connectivity to address the preservation of right-of-way needs.
- Page 13: The last paragraph indicates that the Community Areas section emphasizes seven goals. These seven goals are also repeated on page 122. The County should consider including within each of the eight Community Areas, identified in Chapter 8, how these seven goals are achieved with each community.

Chapter 2: Grow With Purpose

- The Plan's projections of populations and households are consistent with the latest Cooperative Forecasts (RND 8A) adopted by the Baltimore Metropolitan Council in its analysis and is suitable for planning purposes.
- Page 21: the Demographic Profile graphic illustration page lists the labor force of Harford County as 141,926, this number seems high. According to the 2009-2013 ACS, the labor force in the county is listed as 137,367. The 141,926 number is more in-line with the Maryland Department of Planning's 2020 labor force projection for the County. The County should also consider providing a date or footnote data source for each demographic statistic depicted in the graphic illustration and data source on the population timeline graphic.
- Page 25: Did the land capacity analysis take into account the impacts of the Sustainable Growth and Agricultural Preservation Act of 2012 for the areas outside of the Development Envelope? On page 28, the Plan credits the Act with changing development patterns in the rural area.
- Page 25: Planning would be interested in learning more details about the commercial/industrial capability analysis. What were the criteria used to determine an under-utilized non-residential parcel? Was there an attempt to compare the non-residential capacity numbers to projected employment growth in the County?
- Page 26: The last sentence in the Infrastructure paragraph indicates that "A method for prioritizing projects should be used to ensure that the Capital Improvements Plan is consistent with the goals and objectives outlined in *HarfordNEXT*" but there is no corresponding implementation strategy identified in the plan. Perhaps GWP 5 could be expanded to address this strategy to ensure that the CIP is consistent.
- Page 28: Is the proposed expansion of the development envelope in Fallston connected to residents' petitions to expand the Sanitary Sewer Service Area, as described on P. 27? If so, perhaps it makes sense to wait for the detailed comprehensive study of the Fallston Sanitary Sewer Service Area before making a recommendation.
- Page 28: It would be helpful to provide maps and data about the 3 new areas that are being added to the Development Envelope. It would be supportive for the plan to discuss the number of acres that are being added to each individual land use planning category. It would also be helpful to describe the amount of new residential or commercial capacity being added to the Development Envelope as a result of these new parcels being added.
- Page 28, Study Area: Harford County is projected to grow by approximately 18,525 households between 2015 and 2040. Given that the current land capacity inside the

development district could accommodate all of this growth, is it necessary at this time to explore new growth areas in addition to the existing Development Envelope? Perhaps the last sentence could incorporate “to determine the need for any future growth area”. While the Study Area will assess impacts to infrastructure and opportunities for land preservation, the description of the purpose of the Study Area could benefit from additional discussion.

- Page 29: The second paragraph indicates that there are nine Rural Villages and that the Rural Villages Study should be updated. Three of the Community Areas in Chapter 8 identify updating the Rural Villages Study as part of their implementation strategies. The Plan should include an implementation strategy to ensure that all Rural Villages are included in the Rural Villages Study update.
- Page 34, GWP 1.1 (a): proposes to identify barriers to infill development. Be sure to include any barriers that are caused by state laws, rules or regulations that have impeded local implementation of the comprehensive plan, as part of your Annual Report, pursuant to §1-207(c)(6)(iv).
- The Plan does identify schools as an infrastructure investment and the Educational Facilities Master Plan as one of several strategy plans to ensure service delivery standards contributing to the needs of current and future residents. However, the County may want to consider a more direct recognition of the of the impact of School facilities not just on educational delivery, but also the impacts on land development, transportation patterns, housing prices, and residential choices, the sustainability of existing communities and the importance of schools as community infrastructure.

Because K-12 school infrastructure demands differ over time and the County and the BOE has a huge investment in its schools, we encourage the county to partner closer with the Board of Education through both the Comprehensive Plan and the Educational Facilities Master Plans to identify areas where school facility investments could be coordinated with investments in sustainable communities.

The inclusion of some implementation policies regarding schools such as strategically locating schools, ensuring safe walking routes, promoting connectivity are identified in different sections of the Plan. The following are some additional linkages to schools the County may want to consider under the chapters on Grow with Purpose, Economic Vitality, Environmental Stewardship, Mobility and Connectivity and Promoting Healthy Communities.

- Align Infrastructure investments around a common set of goals such as: To get the best value out of the school facility investments, consider funding priorities driven by both educational priorities and sustainable community objectives.
- Promote quality school facilities to help attract and retain teachers, support improved student outcomes, and provide a positive economic impact to a community.

- Promote community use of schools; School facilities matter to communities where the school serves as an integral space for neighborhood activity.
- Coordinate programs and investments, both public and private, in and around existing schools to equip families and communities with the environment, services and support needed to succeed.
- Investment in school improvements contributes to community and environmental improvements in older neighborhoods
- Encourage new and infill development around existing schools as a way to help reduce traffic and increase walking and biking.

Chapter 3: Economic Vitality

- Page 49, GEV1.2 (b): This recommendation, “Continue to improve transportation and utilities infrastructure that support the needs of existing businesses,” is important. It could go a step further by suggesting that the county will prioritize the maintenance, upgrades and improvements to infrastructure that supports the needs of existing businesses, which would imply that this takes precedence over new infrastructure to support business growth in new areas.
- Page 49, GEV1.2 (c): This recommendation references opportunity sites. Are these mapped, identified or defined in the plan?
- Page 50, GEV1.4 (a): Will this evaluation of commercial land use capacity include capacity in underused buildings, in addition to underused parcels?
- Page 50, GEV1.5 (b): A tiered incentive program to encourage developers to use innovative development practices is a good idea. Will the county consider using tiered incentives to encourage developers to focus on sites/buildings in identified revitalization areas?
- Page 50, GEV1.6 (f): Temporary uses such as bazaars and flea markets do not really have an impact on Harford County’s status as a food hub, unless they have a specific food aspect to them.
- Page 51, GEV2.1 (f): Integration of housing along commercial corridors is a good idea, but by itself will not increase pedestrian activity. This may be addressed elsewhere in the plan, but it might be useful to add something about compact design and pedestrian infrastructure to this statement.
- Page 51, GEV 2.2 (b): Encourages a Business Improvement District (BID) for the U.S. 40 Corridor. Page 33, GWP 3.2(b) and page 164 GCPA 6.6(b) suggest that the BID be limited to area between MD 152 and MD 24.

- Page 52, GEV2.3 (b): Offering programs that encourage property owners to rehabilitate their physical facilities and infrastructure is a good idea, but the county may want to consider not limiting this to supporting new businesses. The existing businesses could also benefit from this.
- Page 52, GEV3.1 – Skilled Workforce: Does the plan address transportation needs related to workforce development elsewhere?

Chapter 4: Environmental Stewardship

- Page 58, Natural Resource Management: The second sentence states that “To limit conflicts and to maximize efficiency, care and reason must be used when determining where population growth should occur in relation to natural resources.” Besides the Study Area, how do the Environmental Stewardship implementation strategies or *HarfordNEXT* address this?

Planning’s Resource Conservation & Management Staff offers the following three comments to enhance consistency between the County’s 2004 Water and Sewer Master Plan and its amendments.

- Page 61, GES 2.1: Indicate any wellhead protection measures, septic system reduction and remediation actions, and the use of best available technology (BAT) applications to ensure the highest water quality.
- Page 62, GES 2.4: Add measures to investigate methods to reduce potential threats by zoning and alternative wastewater discharge methods.
- Page 66, GES 5.4: Add measures to support and implement the guidance goals and objectives outlined in the MDE (Environment) approved 2014 Harford County Solid Waste Management Plan.

Chapter 5: Preserving Our Heritage

- Page 72: The graphic illustration shows a category of “National Register of Historic Properties”. Consider revising to “National Register of Historic Places” and include a date and data source to the graphic.
- Page 77: The graphic illustration “Acres Preserved in Harford County” by program does not match the acres, by program, included in Appendix 1, Figure 10, page xv. Consider including a data and data source to the graphic illustration and Figure 10.
- Page 77: The first sentence on the page says that the Agricultural Stewardship Act of 2006 required counties to adopt a Priority Preservation Area (PPA) Plan. This was a requirement only for counties that sought state certification of their farmland

preservation programs. Planning commends the county for expanding its PPA and raising its land preservation goal from 55,000 to 75,000 acres.

- Page 79: The graphic illustration shows the market value of agricultural products sold as \$46 million and states that the sales increased by 30 percent from 2007 to 2012. This is incorrect. The sales increased by only 7.3 percent from 2007 (\$42.9 million). Moreover, if the 2007 sales values were adjusted for inflation then the change in sales value between 2007 and 2012 would have *decreased* by 13.4 percent. Further worth noting on this page is that only the value of products sold is compared to the 2007 Ag census. It would be helpful if all the items listed on the profile are compared to their 2007 values. For example, comparing the acres of corn produced, the number of principal operators, and the number of farms and acres of farmland would all show a decline between 2007 and 2012. This finding could be useful for Harford County to develop plans or programs for conservation of its farms and farmland.
- This chapter should consider including a discussion of how well the Transfer of Development Rights (TDR) program is working and consider including an implementation strategy consider revising the TDR program as a result of the statewide TDR Committee recommendations.
- This chapter should including a discussion of the County's first installment purchase agreements in the County's easement program and opportunities for up additional funds for easement purchases.
- Page 81: Planning would be interested in description about about the "Army buffering easement program to preserve productive farm and natural resource land close to Aberdeen Proving Ground..." The Navy has provided millions of dollars to preserve land in order to protect flight paths in Southern Maryland; comparable funding in Harford from the army could protect significant amounts of land.
- Page 82, GPOH 2.2 (b): Consider revising to say "maintain an efficient permit process for the processing of agricultural products." This may avoid any confusion with converting agricultural uses to commercial uses.

Chapter 6: Mobility and Connectivity

- Planning commends the County for including complete streets goals and strategies in the Plan. In order to provide transportation choices, protect the air quality, improve public health and help reduce state and local expenditures on infrastructure, it is vital that we design our transportation facilities for all users, not just the single occupancy automobile. Planning recommends the plan provide greater detail on how and where the County intends to implement complete streets.
- Planning appreciates the comprehensive plan's inclusion of innovative transportation demand management strategies, such as the proposed operation of express bus service

with queue jumping lanes on US-40 and MD-22, the proposed bicycle and car sharing programs in Havre de Grace and at the Aberdeen Proving Ground and the goal to attract an Aberdeen Proving Ground bus shuttle service to connect commuters from the Aberdeen train Station to APG. These strategies are important steps to help reduce traffic congestion and decrease maintenance costs on roadways.

- Planning is encouraged that the plan's transportation objectives seek to provide a pedestrian and bicycle circulation system that connects residents to schools, shopping, work and play. It would be helpful if the plan included a map of existing and proposed bicycle and pedestrian facilities so readers would better understand how and where new linkages would be built. Also, information on how the County plan's on funding new non-motorized facilities would be beneficial. SHA's Transportation Alternatives Program may be a funding option for sidewalk construction. More information can be found at <http://www.roads.maryland.gov/Index.aspx?PageId=144>.
- Planning encourages the County to consider adding marked bicycle lanes when re-surfacing projects occur. This may be a quicker and lower cost option as opposed to constructing new pathways or sidewalks.
- Page 94, GMC 1.1 (a): Planning appreciates that the plan considers the potential for accommodating connected and automated vehicles. To accommodate these vehicles, you may want to consider more aspects than just providing new exclusive travel lanes, e.g., addressing the potential sprawl effects of using these types of vehicles and accommodating pedestrians and bicyclists. The County may want to broaden the implementation strategy to include language on these additional considerations.
- Page 94, GMC 1.1 (b) and (c): Planning commends the County for considering coordinated land use and corridor capacity management/preservation with the goals and policies of HarfordNEXT. It would be helpful to know if the County has right-of-way preservation regulations, policies or plans for corridors including necessary spaces for a shared-use path.
- Page 94, GMC 1.3 (b): Planning appreciate the County's desire to create flexible Level of Service (LOS) standards for intersections inside and outside of the Development Envelope. Please keep in mind that in locations where complete streets policies are envisioned, roadway design and its associated LOS standards should safely accommodate all users, which should consider a lower LOS for roads. For instance, in a compact/mixed-use area with transit accessibility, LOS E for intersections may be more appropriate to accommodate a complete streets design. Similar LOS adjustments may be appropriate in GWP2.1 (a) for infill areas.
- Page 97, GMC2.3(c): Planning is pleased that the County supports a safe bicycle and pedestrian crossing over the Susquehanna River. Providing safe travel accommodations for bicyclist (e.g. bike lanes, shared-use paths) is an economic development/tourism tool as well as a way to reduce reliance on the automobile. Strategies to connect Harford and Cecil County will benefit the local and regional

economy by attracting East Coast Greenway users to travel through Perryville and Havre de Grace. Planning is encouraged that MDOT/MDTA will allow cyclists during limited days/hours to begin crossing the US-40 Hatem bridge this summer.

- Page 97, GMC 3.1: Planning recommends the County establish development standards that incorporate multimodal options and connectivity into new projects. We encourage the County to consider assessment and provisions of multimodal transportation facilities, e.g., pedestrian, bicycle, and transit facilities, in the APFO's. Some local jurisdictions in Maryland, e.g., the City of Rockville, encourage developers to provide multimodal facilities by providing credits toward trip mitigation requirements.
- Page 100, GMC 4.4: Planning strongly supports the County's comprehensive transit service improvement strategies. As discussed above, we encourage the County to consider the assessment of transit service adequacy in the APFO's as a way to encourage developers' contribution toward transit.
- Page 100, GMC 4.5: Planning suggests changing the statement to, "Improve headways and speeds on all bus routes." Headway and speed are two different measures for transit services. Headway is normally referred to as frequency.

Chapter 7: Promoting Healthy Communities

- Page 109: Includes farmers' markets, community supported agriculture, community gardens, local farm items in the public schools, access to healthy food options in food-insecure areas, etc. These are all welcome and important steps toward making a sustainable food system an integral part of community life in Harford County.
- Pages 113-114: The goals on these pages—"Develop opportunities for community gardens and urban farms"; "Encourage expansion of farm to table and farm to school programs"; and "Support local food production and community based agricultural operations"—are very good, as are their implementation measures.
- Pages 169-176: The section of the plan addresses the Northern Tier Community Planning Area and notes that the Northern Tier contains 46.3% of the County's land, that 70.9% of the Northern Tier area is agricultural, and 70% of the County's total preserved land is located there. Most of the County's PPA is in the Northern Tier. Community Planning Area (CPA) goal 7.21—"Provide safe, convenient access to healthy food choices for all residents"—lists implementation strategies that support agriculture and a sustainable food system. Item c makes a particularly important point, recognizing the "mutual benefit of connections between rural economies as food producers and urban economies as processors and consumers" (page 176).

Chapter 8: Community Planning Areas

- Chapter 8 calls for preserving right-of-way for future expansion of MD-22 and MD-155, which have large segments outside of the Development Envelope and/or priority funding areas. We encourage the County to investigate, prioritize and promote transportation demand management strategies along these corridors.

Churchville/Creswell Planning Area

It appears that a portion of the Churchville/Creswell planning area is located within the Study Area identified in Chapter 2 as an area for a potential growth area. Is the County thinking that this area may be added to the Development Envelope? In the Community Planning Areas Chapter, limiting the amount of new development to support existing agricultural areas, including some areas of the PPA and Deer Creek Rural Legacy Area seems to be a goal. Increasing the Development Envelope with new growth areas would impact the County's ability to achieve these community planning goals.

Planning's Resource Conservation & Management Staff offers the following comments to enhance consistency between the County's 2004 Water and Sewer Master Plan and its amendments:

- Page 126, GCPA 1.6 (a): Enhance this implementation step to include "identify these areas in the County's Water and Sewer Plan and prioritize by highest to lowest health risks."

(a) Connect septic system areas, where they would be better served by public sewer, and prioritize Bay Restoration Funds for new and replacement BAT septic systems that are located within either 1,000 feet of perennial streams or the Green Infrastructure Network.
- Page 141, GCPA 3.6 (b): Enhance this implement step to include "identify these areas in the County's Water and Sewer Plan and prioritize by highest to lowest health risks."

(b) Connect septic system areas, where they would be better served by public sewer, and prioritize Bay Restoration Funds for new and replacement BAT septic systems that are located within either 1,000 feet of perennial streams or the Green Infrastructure Network.
- Page 148, GCPA 4.6: Consider adding (b) from above, including "identify these areas in the County's Water and Sewer Plan and prioritize by highest to lowest health risks"; and consider adding a new (c).

(b) Connect septic system areas, where they would be better served by public sewer, and prioritize Bay Restoration Funds for new and replacement BAT septic

systems that are located within either 1,000 feet of perennial streams or the Green Infrastructure Network.

We recommend adding this new implementation:

(c) Limit expansion of the water and sewer service areas beyond areas that do not meet Priority Funding Area (PFA) minimum standards and provide support to the goals and objectives of transportation and environmental concerns.

- On Page 157, GCPA 5.9: Enhance this implement step to include “identify these areas in the County’s Water and Sewer Plan and prioritize by highest to lowest health risks.”

(a) Connect septic system areas, where they would be better served by public sewer, and prioritize Bay Restoration Funds for new and replacement BAT septic systems that are located within either 1,000 feet of perennial streams or the Green Infrastructure Network.

- On Page 165, GCPA 6.9: Enhance this implement step to include “identify these areas in the County’s Water and Sewer Plan and prioritize by highest to lowest health risks.”; and consider adding a new (c).

(a) Connect septic system areas, where they would be better served by public sewer, and prioritize Bay Restoration Funds for new and replacement BAT septic systems that are located within either 1,000 feet of perennial streams or the Green Infrastructure Network.

We recommend adding this new implementation:

(c) Limit expansion of the water and sewer service areas beyond areas that do not meet Priority Funding Area (PFA) minimum standards and provide support to the goals and objectives of transportation and environmental concerns.

Appendix I: Priority Preservation Area Plan

Planning commends the County for its preservation efforts and goal to diversity agricultural business and promotion of agricultural products. The PPA plan incorporates the county growth tier map.

Appendix II: Water Resource Element Plan

Planning’s Resource Conservation & Management Staff offers the following comments:

- The plan does not include different land use plan scenarios for evaluation of variant nutrient load impacts to determine the least impactful scenario. However, the Plan included as a stated County’s growth goal to focus new development inside of its

current Development Envelope (DE). This DE is nearly concurrent with the County's water and sewer service full service area. The Plan identifies three new growth areas, identified on Page 10, that total approximately 145 acres (0.26% increase to the DE). These areas are envisioned to be developed with similar densities and land uses to the adjacent areas they abut. The plan indicates a policy for maintaining the current DE and a concerted effort to direct the greatest growth inside of the DE and the county's Priority Funding Areas. Coupled with the efforts to limit new septic system development outside of the DE, *it did not appear necessary to execute the laborious task of creating and evaluating different land use scenarios for this update effort.*

However, the WRE tabular data and information on the water and sewerage systems should be updated to reflect the latest Water and Sewer Plan amendment information, as approved or modified by MDE. This will ensure that the most current information is being used to evaluate projected land use development demands against adequate water supply and receiving water TMDL capabilities. There have been numerous Water and Sewer Plan amendments and more recent published data that are not evident in this text.

Guidance to assist the WRE towards consistency

We recommend the WRE section should be revised to ensure consistency with the goals, objectives and environmental remediation actions outlined in other elements of the comprehensive plan.

- The WRE should emphasize that its primary purpose is to serve as a report and record of the selected land growth plan and the associated impacts to the water resources that current use and projected changes are expected to impart.
- The WRE should include language that indicates if, or when, expansion requests to the water or sewer service areas occur, the WRE should be used to evaluate the capacity and nutrient impacts but should not be considered the primary element for comprehensive plan consistency findings.
- The WRE states, on page xx of Appendix II, "A primary objective of *HarfordNEXT* is to protect and conserve the County's water resources." However, this is not listed as one of the plan's five primary objectives. It would be helpful that the WRE state where and when such expansions of DE and the Water and Sewer boundaries would be consistent with the County growth goals. This could be carried out by stating public sewer and water expansion is restricted to designated growth areas, or to health concern areas that are later identified and amended into the County Water and Sewer Plan. When there is a request to expand the water or sewer service areas, the County should provide MDE and MDP the supporting goals, policies and objectives that the Plan provides towards consistency.

The following text changes are suggested:

- Appendix II, Page xxiv, 2nd paragraph:

The orderly development of the County's public water supply system is controlled through the Water and Sewer Master Plan (WSMP) and the County's Capital Budget and Five Year Capital Improvement Program (CIP). The WSMP outlines phased improvements to its water supply system required to satisfy existing and future development. In addition, the County's APF regulations require adequate capacity to service planned development within the Development Envelope.

Suggested text change to the first sentence:

The orderly development of the County's public water supply system is managed through the Water and Sewer Master Plan (WSMP) and the County's Capital Budget and Five Year Capital Improvement Program (CIP), that are consistent with the goals and policies of the County Comprehensive Plan.

Appendix III: Functional Classification of Roads

No comments.